

<b>PRE-APPEAL BRIEF REQUEST FOR REVIEW</b>		<b>Docket Number:</b> STL920000034US1	
I hereby certify that this correspondence is being transmitted via the EFS-Web System to the USPTO on:  <div style="text-align: center; margin: 10px 0;"><u>November 6, 2007</u></div> Signature: _____  Typed or Printed Name: <u>David W. Victor</u>		<b>Application Number:</b> 09/579,864	<b>Filed:</b> May 25, 2000
		<b>First Named Inventor:</b> B.C. HAWKS et al.	
		<b>Art Unit:</b> 2145	<b>Examiner:</b> Adnan M. Mirza
<p>Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.</p> <p>This request is being filed with a notice of appeal.</p> <p>The review is requested for the reason(s) stated on the attached four (4) sheet(s).          Note: No more than five (5) pages may be provided.</p> <p>I am the:</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%;"> <input type="checkbox"/> applicant/inventor              <input type="checkbox"/> assignee of record of the entire interest.            See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed. (Form PTO/SB/96)              <input checked="" type="checkbox"/> attorney or agent of record.            Registration Number <u>Registration No. 39,867</u>    <input type="checkbox"/> attorney or agent acting under 37 CFR 1.34            Registration number if acting under 37 CFR 1.34            _____         </div> <div style="width: 45%; text-align: center;"> <div style="margin-bottom: 10px;"> <u>/David Victor/</u> Signature           </div> <div style="margin-bottom: 10px;"> <u>David W. Victor</u> Typed or Printed Name           </div> <div style="margin-bottom: 10px;"> <u>(310) 553-7977</u> Telephone Number           </div> <div> <u>November 6, 2007</u> Date           </div> </div> </div>			
<p><b>NOTE:</b> Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required*.</p>			

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant(s):	B.C. HAWKS et al.	Examiner	Adnan M. Mirza
Serial No.	09/579,864	Group Art Unit	2145
Filed	May 25, 2000	Docket No.	STL920000034US1
TITLE	METHOD OF, SYSTEM FOR, AND COMPUTER PROGRAM PRODUCT FOR PROVIDING A DATA STRUCTURE FOR CONFIGURING CONNECTIONS BETWEEN A LOCAL WORKSTATION FILE SYSTEM AND A REMOTE HOST FILE SYSTEM		

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**PRE-APPEAL BRIEF REQUEST FOR REVIEW ARGUMENTS**

Applicants request reconsideration of the rejection of claims 1-30 as obvious (35 U.S.C. §103) over Stedman (U.S. Patent No. 6,081,837), Imai (U.S. Patent No. 6,148,334), and Harvey (U.S. Patent No. 6,519,568) as presented in the Final Office Action dated August 6, 2007 (“Final Office Action”).

With respect to claims 1, 2, and 15, Applicants request review of the Examiner’s findings that Stedman in combination with col. 15, lines 44-54 and col. 2, lines 55-63 of Imai teaches the claim requirements that the local system, host system, and mapping data structures between a file in the local and host file systems and a transfer type comprises tags in a meta language format that form a file system connection descriptor. (Final Office Action, pgs. 2-4)

Applicants note that although the Examiner combined Stedman and Imai, the Examiner did not cite to specific parts of Stedman to combine with Imai on pages 2-4 of the Final Office Action where the Examiner proposed this combination. Applicants submit that the cited Imai does not teach or suggest the claimed local system data structure, host system data structure, and mapping data structure as comprising tags in a metalanguage format forming a file system connection descriptor to support remote editing of files in the host file system from the local file system.

The cited col. 15 mentions that the URL of a requested file is in a form enclosed by a special tag. When the file requesting client requests the requested file and the file is received from the file server, the requested file is displayed at the viewer of the file requesting client. The viewer also detects the URL of the file enclosed by the special tag. The cited col. 2 mentions providing a file transfer method to limit a number of files when a file transfer is not fast enough or storage capacity is insufficient or when a file display is limited.

The cited cols. 2 and 15 of Imai nowhere teach or suggest tags in a metalanguage format for a local system data structure, a host system data structure, a mapping data structure, and a

transfer type. Instead, the cited cols. 2 and 15 discuss how a URL may be in a special tag and how to provide a file transfer method under certain conditions, such as when a file transfer is not fast enough, or available storage capacity is insufficient. Nowhere does the cited discussion in Imai teach or suggest the claim requirements of a local file system data structure, a host file system data structure, and a mapping data structure between files in the local file system and files in the host file system, and a transfer type comprising tags in a metalanguage format that forms a file system connection descriptor.

Further, even if one were to combine the cited Imai with the other references, the cited combination would not teach the claim requirements concerning a local file system data structure, a host file system data structure, and a mapping data structure comprising tags in a meta language format as claimed. The cited Imai provides special tags for a URL of a file, not a local file system, host file system, and mapping data structures as claimed.

Applicants further request review of the Examiner's finding that col. 19, lines 21-27 of Harvey teaches that the claimed file system connection descriptor supports remote editing of files in the host file system from the local file system. (Final Office Action, pgs. 4-5)

The cited col. 19 of Harvey discusses digital data conversion between file formats, including mapping between the file formats, and data filtering. The dropbox server manages the publication of files to the dropbox web server. Harvey also discusses data conversion in the context of file delivery between locations. (Harvey, col. 4, lines 3-21)

Although the cited col. 19 of Harvey discusses converting files from one format to another, nowhere is there any teaching or suggestion of a transfer type that defines a data format for transferring data between the host system and the local system. Instead, the cited col. 19 discusses converting files between different file formats when transferring. Nowhere does this cited col. 19 teach or suggest a transfer type that defines a data format for transferring data between a host and local system. Moreover, nowhere does the cited col. 19 discuss the conversion to support remote editing of files in the host file system from the local file system. Thus, even if one were to modify the other references with Harvey to provide file conversion, this proposed modification still does not teach or suggest the claim requirement of a transfer type that defines a data format for transferring data between a host and local system to support remote editing of files in the host file system from the local file system.

Applicants further request review of the rejection of claims 3, 9, and 16 depend, which depend from claims 2, 1, and 15, respectively, and further require that the mapping data structure comprises: a local file extension data structure storing a local file extension; and a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied. Applicants request review of the Examiner's finding that col. 22, lines 16-53 of Imai teaches the claim requirement of a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied. (Final Office Action, pg. 5)

The cited col. 22 mentions that a user requests the transfer and the display of a file by issuing a request and uses the URL to identify the file. A request handling unit in the client handles the display, the file request unit transmits the file request, and the file server program transfers the file to the file requesting client. The client may receive a file list. The list includes files having identifiers requested by the user.

The cited col. 22 of Imai discusses handling of a file request between server and client. Nowhere does the cited col. 22 anywhere teach or suggest the claim requirement of a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied. Instead, the cited col. 22 discusses how a file or list of files matching a request is returned to the client.

The Examiner grouped claims 4, 22, and 29 in his rejection. (Final Office Action, pgs. 6-7). However, each of these claims recite very different limitations. Claim 17 substantially includes the requirements of claim 4. The Examiner grouped claim 17 with claims 10 and 28 (Final Office Action, pg. 7). Claim 10 is substantially similar to claim 17, but claim 28 includes unrelated requirements.

Claims 4 and 17 depend from claims 1 and 15 and further require that the mapping data structure further comprises a host codepage data structure storing an identification of a host codepage in which data in the host file is encoded; and a local-codepage data structure storing an identification of a local codepage in which data in a local file is encoded.

Applicant's request review of the Examiner finding that col. 27, lines 23-53 of Imai teaches the additional requirements of claim 4. (Final Office Action, pgs. 6-7)

The cited col. 27 of Imai mentions transferring only those files selected according to the file type to prevent waste due to the transfer of files that cannot be utilized at the file requesting client. In a third example, the multiple files transfer request unit is for transferring only those

file which match the transfer condition provided in the file requesting client. Nowhere does this cited col. 27 anywhere teach or suggest a mapping data structure further including a host codepage data structure storing an identification of a host codepage in which data in the host file is encoded and a local-codepage data structure storing an identification of a local codepage in which data in a local file is encoded. Nowhere is there any mention or suggestion of host and local codepages as claimed.

Applicants request review of the Examiner's finding that col. 22, lines 37-54 of Harvey teaches the additional requirements of claims 22, 25, and 28 (Final Office Action, pg. 8), which depend from claims 1, 2, and 15, and further require a first transfer type indicates to transfer one file unmodified between the host file system and the local file system and wherein a second transfer type indicates to translate text in the file to transfer from the host file system to the local file system.

The cited col. 22 mentions a hierarchical interface hosting links to applications. An application is defined as a set of web pages and/or associated server and/or client side code that implements business line-specific navigation and/or behavior. The eHub has a user interface that allows adding a new data item or folder to the eHub catalog, specifying attributes and optionally access control, and transferring the data (e.g. files) from the publishing system from the eHub; modifying the attributes or access control of an existing catalog data item or folder; moving a data item or folder from one place in the hierarchy to another and removing a data item/folder from the catalog (removing a folder will implicitly remove all items under it). The eHub will provide through its user interface access to several user support features: documentation and site guides, on-line help, technical support gateways (e-mail, phone, etc.) and problem reporting.

Although the cited col. 22 discusses transferring files from a publishing system from the eHub, nowhere does the cited col. 22 anywhere teach or suggest that a first transfer type indicates to transfer one file unmodified between the host file system and the local file system and that a second transfer type indicates to translate text in the file to transfer from the host file system to the local file system. Nowhere does the cited Harvey teach or suggest that the transfer type is in a mapping data structure comprising at least one tag as claimed.

Dated: November 6, 2007

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